

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA

ELIZABETH SINES ET AL.

: Case No. 3:17-CV-72

Plaintiff

: Judge MOON

:

-v-

JASON KESSLER ET AL.

:

:

Defendants

MOTION TO DISMISS THE PLAINTIFF'S COMPLAINT

Now comes defendant Vanguard America and moves the Court to dismiss the Plaintiff's claims against it pursuant to FRCP 12.

Respectfully Submitted,

s/ Elmer Woodard
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CERTIFICATE OF SERVICE

I hereby certify this Notice and all accompanying documents were served via electronic mail on December 7, 2017 upon:

All parties of record. One party is entitled to or has requested service by other means and said party has been served by regular US mail as follows:

Mr. Michael Enoch Peinovich
PO Box 1069
Hopewell Junction, NY 12533 .

s/ Elmer Woodard

E. Woodard (VSB 27734)